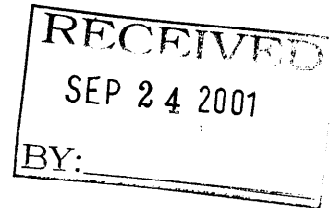




September 13, 2001

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C St. SW
Washington, DC 20204



RE: Label Claims/Disclaimers

Dear Sir/Madam:

This letter is to notify you that PhytoPharmica at 825 Challenger Drive, Green Bay, Wisconsin 54311 is a distributor and has included statements provided for by section 403(r)(6) of the Food, Drug, and Cosmetic Act on the labels of the following product.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
PhytoPharmica (a Division of Integrative Therapeutics, Inc.)	Glucosamine Sulfate and Chondroitin	Chloride (from glucosamine sulfate), Sodium (from glucosamine sulfate), Glucosamine Sulfate (stabilized), Chondroitin Sulfate (from marine source)	Dietary supplement to help build and maintain joint cartilage*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

By: Robert C. Doster
Robert C. Doster
Title: Senior Vice President of Scientific Affairs

Date: 9-13-01

If you have any questions, please contact Jeanene Moenckmeier, Director of Legal Affairs at (920) 469-4440.

Sincerely,

Jeanene Moenckmeier
Jeanene Moenckmeier
Director of Legal Affairs

GSCS.1p

975 0162

LET 8611

825 CHALLENGER DRIVE
GREEN BAY, WI 54311-8328
920-469-9099
TOLL FREE 800-553-2370
FAX 920-469-4418
FAX TOLL FREE 888-311-5657
WWW.PHYTOPHARMICA.COM



September 14, 2001

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C St. SW
Washington, DC 20204

RE: Label Claims/Disclaimers

Dear Sir/Madam:

This letter is to notify you that PhytoPharmica at 825 Challenger Drive, Green Bay, Wisconsin 54311 is a distributor and has included statements provided for by section 403(r)(6) of the Food, Drug, and Cosmetic Act on the labels of the following product.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
PhytoPharmica (a Division of Integrative Therapeutics, Inc.)	Glucosamine Sulfate and Chondroitin	Chloride (from glucosamine sulfate), Sodium (from glucosamine sulfate), Glucosamine Sulfate (stabilized), Chondroitin Sulfate (from marine source)	A highly absorbable formula offering ultimate support for joints and cartilage.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

By: Robert C. Doster

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 9-14-01

If you have any questions, please contact Jeanene Moenckmeier, Director of Legal Affairs at (920) 469-4440.

Sincerely,

Jeanene Moenckmeier
Director of Legal Affairs

GSCS.2p

825 CHALLENGER DRIVE
GREEN BAY, WI 54311-8328
920-469-9099
TOLL FREE 800-553-2370
FAX 920-469-4418
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WWW.PHYTOPHARMICA.COM

September 15, 2001

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C St. SW
Washington, DC 20204

RE: Label Claims/Disclaimers

Dear Sir/Madam:

This letter is to notify you that PhytoPharmica at 825 Challenger Drive, Green Bay, Wisconsin 54311 is a distributor and has included statements provided for by section 403(r)(6) of the Food, Drug, and Cosmetic Act on the labels of the following product.

COMPANY	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENTS
PhytoPharmica (a Division of Integrative Therapeutics, Inc.)	Glucosamine Sulfate and Chondroitin	Chloride (from glucosamine sulfate), Sodium (from glucosamine sulfate), Glucosamine Sulfate (stabilized), Chondroitin Sulfate (from marine source)	Studies show glucosamine sulfate is a key building block for joint cartilage.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

By: 


Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 9-15-01

If you have any questions, please contact Jeanene Moenckmeier, Director of Legal Affairs at (920) 469-4440.

Sincerely,


Jeanene Moenckmeier
Director of Legal Affairs

GSCS.3p

825 CHALLENGER DRIVE
GREEN BAY, WI 54311-8328
920-469-9099
TOLL FREE 800-553-2370
FAX 920-469-4418
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September 16, 2001

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C St. SW
Washington, DC 20204

RE: Label Claims/Disclaimers

Dear Sir/Madam:

This letter is to notify you that PhytoPharmica at 825 Challenger Drive, Green Bay, Wisconsin 54311 is a distributor and has included statements provided for by section 403(r)(6) of the Food, Drug, and Cosmetic Act on the labels of the following product.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
PhytoPharmica (a Division of Integrative Therapeutics, Inc.)	Glucosamine Sulfate and Chondroitin	Chloride (from glucosamine sulfate), Sodium (from glucosamine sulfate), Glucosamine Sulfate (stabilized), Chondroitin Sulfate (from marine source)	Featuring a low molecular- weight, marine-sourced chondroitin that penetrates cartilage and works where it's needed.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

By: 

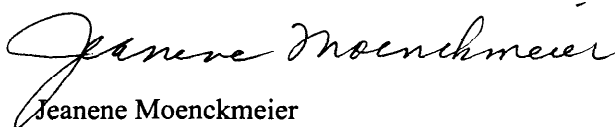
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 9-16-01

If you have any questions, please contact Jeanene Moenckmeier, Director of Legal Affairs at (920) 469-4440.

Sincerely,



Jeanene Moenckmeier
Director of Legal Affairs

GSCS.4p

825 CHALLENGER DRIVE
GREEN BAY, WI 54311-8328
920-469-9099
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September 17, 2001

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C St. SW
Washington, DC 20204

RE: Label Claims/Disclaimers

Dear Sir/Madam:

This letter is to notify you that PhytoPharmica at 825 Challenger Drive, Green Bay, Wisconsin 54311 is a distributor and has included statements provided for by section 403(r)(6) of the Food, Drug, and Cosmetic Act on the labels of the following product.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
PhytoPharmica (a Division of Integrative Therapeutics, Inc.)	Glucosamine Sulfate and Chondroitin	Chloride (from glucosamine sulfate), Sodium (from glucosamine sulfate), Glucosamine Sulfate (stabilized), Chondroitin Sulfate (from marine source)	Low molecular weight chondroitin combined with our glucosamine sulfate for total joint health.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

By: Robert C. Doster

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 9-17-01

If you have any questions, please contact Jeanene Moenckmeier, Director of Legal Affairs at (920) 469-4440.

Sincerely,


Jeanene Moenckmeier
Director of Legal Affairs

GSCS.5p

825 CHALLENGER DRIVE
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September 18, 2001

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C St. SW
Washington, DC 20204

RE: Label Claims/Disclaimers

Dear Sir/Madam:

This letter is to notify you that PhytoPharmica at 825 Challenger Drive, Green Bay, Wisconsin 54311 is a distributor and has included statements provided for by section 403(r)(6) of the Food, Drug, and Cosmetic Act on the labels of the following product.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
PhytoPharmica (a Division of Integrative Therapeutics, Inc.)	Glucosamine Sulfate and Chondroitin	Chloride (from glucosamine sulfate), Sodium (from glucosamine sulfate), Glucosamine Sulfate (stabilized), Chondroitin Sulfate (from marine source)	Glucosamine Sulfate is 98% absorbable so more glucosamine reaches the body's joints.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

By: Robert C. Doster

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 9-18-01

If you have any questions, please contact Jeanene Moenckmeier, Director of Legal Affairs at (920) 469-4440.

Sincerely,

Jeanene Moenckmeier
Director of Legal Affairs

GSCS.6p

825 CHALLENGER DRIVE
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WWW.PHYTOPHARMICA.COM



September 19, 2001

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C St. SW
Washington, DC 20204

RE: Label Claims/Disclaimers

Dear Sir/Madam:

This letter is to notify you that PhytoPharmica at 825 Challenger Drive, Green Bay, Wisconsin 54311 is a distributor and has included statements provided for by section 403(r)(6) of the Food, Drug, and Cosmetic Act on the labels of the following product.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
PhytoPharmica (a Division of Integrative Therapeutics, Inc.)	Glucosamine Sulfate and Chondroitin	Chloride (from glucosamine sulfate), Sodium (from glucosamine sulfate), Glucosamine Sulfate (stabilized), Chondroitin Sulfate (from marine source)	Chondroitin in sulfate is a important and major component of articular cartilage, which is associated with joint health.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

By: 

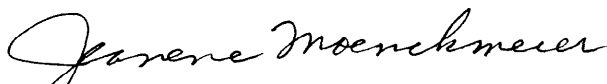
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 9-19-01

If you have any questions, please contact Jeanene Moenckmeier, Director of Legal Affairs at (920) 469-4440.

Sincerely,



Jeanene Moenckmeier
Director of Legal Affairs

GSCS.7p

825 CHALLENGER DRIVE
GREEN BAY, WI 54311-8328
920-469-9099
TOLL FREE 800-553-2370
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September 20, 2001

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C St. SW
Washington, DC 20204

RE: Label Claims/Disclaimers

Dear Sir/Madam:

This letter is to notify you that PhytoPharmica at 825 Challenger Drive, Green Bay, Wisconsin 54311 is a distributor and has included statements provided for by section 403(r)(6) of the Food, Drug, and Cosmetic Act on the labels of the following product.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
PhytoPharmica (a Division of Integrative Therapeutics, Inc.)	Glucosamine Sulfate and Chondroitin	Chloride (from glucosamine sulfate), Sodium (from glucosamine sulfate), Glucosamine Sulfate (stabilized), Chondroitin Sulfate (from marine source)	The low molecular weight of our chondroitin sulfate makes the product easily absorbable where it is needed most.*


I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

By: Robert C. Doster
Robert C. Doster
Title: Senior Vice President of Scientific Affairs

Date: 9-20-01

If you have any questions, please contact Jeanene Moenckmeier, Director of Legal Affairs at (920) 469-4440.

Sincerely,


Jeanene Moenckmeier
Director of Legal Affairs

GSCS.8p

825 CHALLENGER DRIVE
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FAX 920-469-4418
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September 21, 2001

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C St. SW
Washington, DC 20204

RE: Label Claims/Disclaimers

Dear Sir/Madam:

This letter is to notify you that PhytoPharmica at 825 Challenger Drive, Green Bay, Wisconsin 54311 is a distributor and has included statements provided for by section 403(r)(6) of the Food, Drug, and Cosmetic Act on the labels of the following product.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
PhytoPharmica (a Division of Integrative Therapeutics, Inc.)	Glucosamine Sulfate and Chondroitin	Chloride (from glucosamine sulfate), Sodium (from glucosamine sulfate), Glucosamine Sulfate (stabilized), Chondroitin Sulfate (from marine source)	Combining glucosamine sulfate with low molecular weight, marine-source chondroitin results in a highly absorbable formula offering ultimate support for joints and cartilage.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

By: 

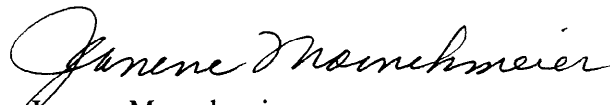
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 9-21-01

If you have any questions, please contact Jeanene Moenckmeier, Director of Legal Affairs at (920) 469-4440.

Sincerely,


Jeanene Moenckmeier
Director of Legal Affairs

GSCS.9p

825 CHALLENGER DRIVE
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September 22, 2001

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C St. SW
Washington, DC 20204

RE: Label Claims/Disclaimers

Dear Sir/Madam:

This letter is to notify you that PhytoPharmica at 825 Challenger Drive, Green Bay, Wisconsin 54311 is a distributor and has included statements provided for by section 403(r)(6) of the Food, Drug, and Cosmetic Act on the labels of the following product.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
PhytoPharmica (a Division of Integrative Therapeutics, Inc.)	Glucosamine Sulfate and Chondroitin	Chloride (from glucosamine sulfate), Sodium (from glucosamine sulfate), Glucosamine Sulfate (stabilized), Chondroitin Sulfate (from marine source)	Our low molecular weight chondroitin sulfate results in improved absorption.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

By: Robert C. Doster

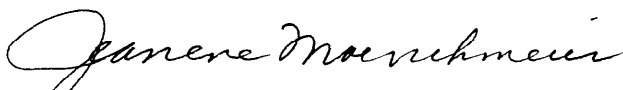
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 9-22-01

If you have any questions, please contact Jeanene Moenckmeier, Director of Legal Affairs at (920) 469-4440.

Sincerely,


Jeanene Moenckmeier

Director of Legal Affairs

GSCS.10p

825 CHALLENGER DRIVE
GREEN BAY, WI 54311-8328
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